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IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

IN RE: McCLAIN FEED YARD, INC., McCLAIN FARMS, INC., AND 7M CATTLE FEEDERS, INC.,	Case No. 23-20084-swe Chapter No. 7 Jointly Administered
Debtors.	
IN RE: 2B FARMS, a Texas General Partnership, et al., Debtors.	Case No. 23-50096-swe Chapter No. 12 Jointly Administered

IN RE: AGTEXAS FARM CREDIT SERVICES; AGTEXAS, PCA; AND THORLAKSON DIAMOND T FEEDERS, LP	
Plaintiffs,	ADV. PROC. NO. 24-02007-swe
and	(Consolidated Adversary Proceeding)
EDWARD DUFURRENA et al., Intervenor-Plaintiffs v.	
RABO AGRIFINANCE, LLC et al.,	
Defendants	
IN RE:	
HTLF BANK, as successor to FIRST BANK & TRUST, Plaintiffs, Counter-Defendant, and Cross-Claim Defendant,	ADV. PROC. NO. 24-02007-swe (Consolidated Adversary Proceeding)
v.	
2B FARMS, a Texas General Partnership, et al., TERRY M. ROBINSON, and REBECCA A. ROBINSON,	
Defendants, Counterclaim-Plaintiffs, Third-Party Plaintiffs and Third-Party Counterclaim Defendants,	
v.	
RABO AGRIFINANCE LLC and MECHANICS BANK,	
Third-Party Defendants, and as to Rabo AgriFinance LLC only, Third-Party Counterclaim Plaintiff and Cross-Claim Plaintiff.	

PLAINTIFFS' AND INTERVENORS' NOTICE OF FILING OF REDLINE OF FIRST AMENDED FEDERAL COMPLAINT (Dkt. 213) TO ORIGINAL FEDERAL COMPLAINT (Dkt. 103)

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs AgTexas Farm Credit Services, AgTexas, PCA, Thorlakson Diamond T Feeders, LP, and Intervenors identified in Paragraphs 16 through 65 of their First Amended Federal Complaint (Dkt. 213) file this notice and would show unto the Court as follows:

I.

- 1. On March 14, 2025, Plaintiffs' and Intervenors' Original Federal Complaint Amending and Consolidating their State Court Petitions (Dkt. 103) was filed in this adversary proceeding. On August 19, 2025, Plaintiffs and Intervenors filed their First Amended Federal Complaint (Dkt. 213).
- 2. Pursuant to this Court's request as stated at the July 17, 2025, hearing on Trustee's Motion to Intervene, Plaintiffs and Intervenors file as Exhibit 1 to this notice a redline of their First Amended Federal Complaint to their Original Federal Complaint as prepared in the commercial software Litera.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2025, the foregoing document was filed with the Clerk of the Court in the foregoing case using the CM/ECF system, which sent notice of electronic filing to all electronic filing users in the case.

/s/ David L. LeBas
David L. LeBas